

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

RONNELL GURLEY,  
Defendant.

INFORMATION

25 Cr.

25 CRIM Q44

COUNT ONE  
(Conspiracy to Distribute Narcotics)

The United States Attorney charges:

1. From at least in or about August 2023 through at least in or about December 2024, in the Southern District of New York and elsewhere, RONNELL GURLEY, the defendant, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

2. It was a part and an object of the conspiracy that RONNELL GURLEY, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance involved in the offense was 500 grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Section 846.)

**COUNT TWO**  
**(Possession of a Firearm After a Felony Conviction)**

The United States Attorney further charges:

4. On or about August 15, 2023, in the Southern District of New York and elsewhere, RONNELL GURLEY, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, to wit: i) a Ruger LCP .380-caliber pistol; and ii) a Beretta CX4 Storm .45-caliber rifle, and the firearms were in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(1) and 2.)

**FORFEITURE ALLEGATIONS**

5. As a result of committing the offense alleged in Count One of this Information, RONNELL GURLEY, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

6. As a result of committing the offense alleged in Count Two of this Information, RONNELL GURLEY, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offense, including but not limited to:

- a. Ruger LCP .380-caliber pistol;
- b. Beretta CX4 Storm .45-caliber rifle

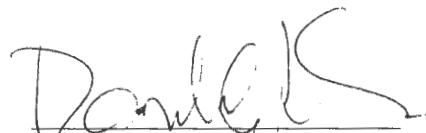
**Substitute Assets Provision**

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 924;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)



DANIELLE R. SASSOON  
United States Attorney